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11 Attorneys for Plaintiff
UNITED STATES OF AMERICA

12
13 UNITED STATES DISTRICT COURT

14 FOR THE CENTRAL DISTRICT OF CALIFORNIA

15 IN THE MATTER OF THE SEIZURE OF
16 \$499,950.00 IN U.S. CURRENCY.

No. CR MIS. NO.

18CM01622

STIPULATION TO EXTEND THE DEADLINE
TO FILE CIVIL FORFEITURE COMPLAINT

[PROPOSED ORDER LODGED
CONTEMPORANEOUSLY HEREWITH]

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21 It is hereby stipulated by and between the United States of
22 America (the "government") and claimant Guirong Yuan ("claimant"),
23 through her counsel, Yoon Ham, for \$499,950.00 in U.S. Currency (the
24 "defendant currency"), as follows:

25 1. Claimant has filed a written claim in administrative
26 forfeiture proceedings with the Federal Bureau of Investigation
27 ("FBI") with respect to the defendant currency.
28

1 the seized currency and/or to obtain an indictment alleging that the
2 assets are subject to forfeiture shall be extended from September 10,
3 2018, to November 9, 2018.

4 7. Claimant knowingly, intelligently, and voluntarily gives up
5 any right she may have under 18 U.S.C. § 983(a)(3)(A)-(C) to require
6 the United States to file a complaint for forfeiture against the
7 defendant currency and/or to obtain an indictment alleging that the
8 defendant currency is subject to forfeiture by September 10, 2018,
9 and any right they may have to seek dismissal of any complaint and/or
10 any forfeiture allegation in an indictment on the ground that it was
11 not filed or returned on or before such date.

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1 NOW, THEREFORE, the parties hereto, by and through their
2 respective attorneys, hereby STIPULATE AND REQUEST that the
3 government's time to file a civil forfeiture complaint in connection
4 with the seizure of the defendant currency be extended to and
5 including November 9, 2018.

6 SO STIPULATED

7 Dated: September 6, 2018

Respectfully submitted,

8 NICOLA T. HANNA
United States Attorney
9 LAWRENCE S. MIDDLETON
Assistant United States Attorney
10 Chief, Criminal Division
STEVEN R. WELK
11 Assistant United States Attorney
Chief, Asset Forfeiture Section
12

13 /s/John J. Kucera

14 JOHN J. KUCERA
Assistant United States Attorney

15 Attorneys for Plaintiff
UNITED STATES OF AMERICA
16

17 Dated: September 6, 2018

18 /s/(per e-mail confirmation)

19 YOON HAM

20 Attorney for Claimant
GUIRONG YUAN
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PROOF OF SERVICE BY MAILING

I am over the age of 18 and not a party to the within action. I am employed by the Office of the United States Attorney, Central District of California. My business address is 312 North Spring Street, 14th Floor, Los Angeles, CA 90012.

On September 10, 2018, I served a copy of: STIPULATION AND REQUEST TO FURTHER EXTEND THE DEADLINE TO FILE CIVIL FORFEITURE COMPLAINT upon each person or entity named below by enclosing a copy in an envelope addressed as shown below and placing the envelope for collection and mailing on the date and at the place shown below following our ordinary office practices.

TO: Yoon Ham, Esq.
Lewis & Ham, LLP
1425 W Foothill Blvd., Ste. 235
Upland, CA 91786

X I am readily familiar with the practice of this office for collection and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on: September 10, 2018 at Los Angeles, California.


Deena R. Bowman